

Assignment and Application of the Unique Identifier under the TSCA

Roundtable Discussion Public Meeting, May 24, 2017

- 1) What factors should EPA consider prior to applying a UID to non-confidential information—what criteria should be used to protect against the inappropriate disclosure of CBI, while also maximizing the public availability of chemical information?
- 2) Are there some filing types to which UIDs should not be applied? For example, should the information in a bona fide notice be considered “information relevant” to a substance that is later the subject of a PMN and NOC?
- 3) Are there other ways that EPA could implement the unique identifier provisions in a manner that would reduce the possibility of CBI being revealed, while making the most important information available (e.g., limiting the application of unique identifiers to submissions containing health and safety studies)?
- 4) Other suggestions for how the unique identifier provisions can be implemented that would not potentially reveal information that would otherwise remain confidential?
- 5) Are there considerations for applying the unique identifier to all information relevant to the applicable chemical substance that would allow for other areas of confidentiality to be put in place (e.g., approaches in CDR data release)?
- 6) Are there common areas of general agreement?